

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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WI-LAN INC.,

Plaintiff,

v.

LG ELECTRONICS, INC. and LG  
ELECTRONICS U.S.A., INC.,

Defendants.

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) 10 Civ. 432 (LAK) (AJP)  
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**DECLARATION OF MATTHEW C. HOLOHAN**

I, Matthew C. Holohan, declare as follows:

1. I am an associate at Kilpatrick Townsend & Stockton LLP. The following facts are within my personal knowledge and if called as a witness by the Court, I would be competent to testify to the matters set forth below.

2. Attached hereto as Exhibit A is a true and correct copy of the Protective Order entered in the above-captioned matter on July 26, 2010.

3. Attached hereto as Exhibit B is a true and correct copy of an Order entered in the above-caption matter on August 18, 2010.

4. Attached hereto as Exhibit C is a true and correct copy of a letter from Matthew C. Holohan to Jeffrey Mote dated December 16, 2010.

5. Attached hereto as Exhibit D is a true and correct copy of a letter from Jeffrey Mote to Matthew C. Holohan dated December 17, 2010.

6. Attached hereto as Exhibit E is a true and correct copy of a letter from Richard

S. Meyer to Jeffrey G. Mote dated December 17, 2010.

7. Attached hereto as Exhibit F is a true and correct copy of redacted portions of the deposition transcript of Goran Cukljevic taken on December 21, 2010.

8. Attached hereto as Exhibit G is a true and correct copy of the transcript of a telephonic hearing conducted in the above-captioned matter on December 21, 2010.


9. Attached hereto as Exhibit H is a true and correct copy of a letter from David E. Sipiora to Magistrate Judge Andrew J. Peck dated December 27, 2010.

10. Attached hereto as Exhibit I is a true and correct copy of the transcript of a Status Conference conducted in the above-captioned matter on December 30, 2010.

11. Attached hereto as Exhibit J is a true and correct copy of an Order entered in the above-captioned matter on January 3, 2011.

12. Attached hereto as Exhibit K is a true and correct copy of an endorsed letter entered in the above-captioned matter on January 3, 2011.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 12th day of January, 2011.

  
Matthew C. Holohan

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